

ANGELA H. DOWS, ESQ.
Nevada Bar No. 10339
CORY READE DOWS & SHAFER
1333 North Buffalo Drive, Suite 210
Las Vegas, Nevada 89128
Telephone: (702) 794-4411
E-Mail: adows@crdslaw.com
Attorney for Defendant Nu Nu Swetz

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	2:17-cr-00181-APG-CWH
)	
Plaintiff,)	
)	
v.)	
)	<u>DEFENDANT NU NU SWETZ'S</u>
NU NU SWETZ,)	<u>UNOPPOSED MOTION FOR</u>
a/k/a MA NU NU WAR,)	<u>EXTENSION OF TIME TO FILE</u>
a/k/a NADI LIN,)	<u>REPLY TO MOTION <i>IN LIMINE</i></u>
)	<u>TO UTILIZE SUBSTANTIVE</u>
Defendant.)	<u>REVERSE 404(b) EVIDENCE</u>

Defendant Nu Nu Swetz through her counsel Angela H. Dows, Esq, hereby respectfully requests that this Court grant an extension of time of seven (7) days to file a Reply to her Motion *in Limine* to Utilize Substantive Reverse 404(b) Evidence (ECF No. 109). This Motion is based upon the attached Memorandum of Points and Authorities.

Dated this 12th day of February, 2021.

Respectfully submitted,
By: /s/ Angela H. Dows
ANGELA H. DOWS, ESQ.
Appointed Counsel for Defendant Swetz

MEMORANDUM OF POINTS AND AUTHORITIES

1. On January 22, 2021, Defendant filed a motion *in limine* to utilize substantive reverse F.R.E. 404(b) evidence as to a person named John Aye Ko, with Exhibits A through D thereof. (ECF No. 1-1.)
2. On February 5, 2021, the Government filed its Opposition to Defendant's Motion, and attaching Exhibits A through G thereof. (ECF No. 116.)
3. That Defendant's Reply was due within seven (7) days of the Government's Opposition, or on or before February 12, 2021.
4. As of the date of filing the deadline for the Reply, counsel for Defendant has not been adequately able to communicate with Defendant (who utilizes a primary language of Burmese) as to the arguments raised in the Opposition so as to be able to prepare a Reply thereof.
5. That Defendant's counsel thus requests an additional brief period of time by which to confer with her client and prepare a Reply to the instant motion.
6. That the instant Motion is not being prepared or filed under any bad faith, or lack of due diligence.
7. That on February 11, 2021, instant counsel contacted counsel for the Government regarding the proposed seven (7) day extension, wherein said counsel responded that she did not have an objection to said extension.

1 8. That Defendant Nu Nu Swetz does not object to the request for extension of
2 time, and instead welcomes the same. This is the first request for extension
3 of time, and instant counsel intends to file the Reply within the extension
4 time frame.
5

6 **CONCLUSION**

7 That, accordingly, instant counsel respectfully requests an additional seven
8 (7) days by which to prepare and file a Reply to her Motion *in Limine* to Utilize
9 Substantive Reverse 404(b) Evidence (ECF No. 109), with a new proposed due date
10 of on or before February 19, 2021.
11

12 Respectfully submitted,

13 CORY READE DOWS & SHAFER
14 By: /s/ Angela H. Dows
15 ANGELA H. DOWS, ESQ.
16 Appointed Counsel for Nu Nu Swetz
17

18 IT IS SO ORDERED:

19 Dated: February 16, 2021

20 
21 ANDREW P. GORDON
22 UNITED STATES DISTRICT JUDGE
23
24
25
26

CERTIFICATE OF SERVICE

The undersigned hereby affirms that a copy of the foregoing:

**DEFENDANT NU NU SWETZ'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE REPLY TO MOTION *IN LIMINE* TO
UTILIZE SUBSTANTIVE REVERSE 404(b) EVIDENCE**

has been served on counsel for the Government by electronic service (ECF) to the
person(s) named below:

NICHOLAS TRUTANICH
United States Attorney
KIMBERLY M. FRAYN
Assistant United States Attorney
JIM W. FANG
Assistant United States Attorney
Counsel for Plaintiff

DATED this 12th day of February, 2021.

/s/ Angela H. Dows
ANGELA H. DOWS, ESQ.